

JENNER & BLOCK LLP

Reid J. Schar (*pro hac vice*)  
RSchar@jenner.com  
353 N. Clark Street  
Chicago, IL 60654-3456  
Telephone: +1 312 222 9350  
Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP

Kate Dyer (Bar No. 171891)  
kdyer@clarencedyer.com  
899 Ellis Street  
San Francisco, CA 94109-7807  
Telephone: +1 415 749 1800  
Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP

Kevin J. Orsini (*pro hac vice*)  
korsini@cravath.com  
825 8th Avenue  
New York, NY 10019  
Telephone: +1 212 474 1000  
Facsimile: +1 212 474 3700

Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PACIFIC GAS AND ELECTRIC COMPANY,  
  
Defendant.

Case No. 14-CR-00175-WHA

**RESPONSE TO REQUEST FOR  
FIGURES FROM  
INVESTIGATION REPORT**

Judge: Hon. William Alsup

Defendant Pacific Gas & Electric Company (“PG&E”) respectfully submits this response to the Court’s December 3, 2019 order requesting Figures 4 and 9 of the CPUC report entitled “Appendix A SED Investigation Report for 2018 Camp Fire with Attachments.”

PG&E has no objection to providing both photographs requested by the Court in an unredacted format.

PG&E also received the CPUC Safety and Enforcement Division’s Camp Fire Report (“Report”) in redacted format. The claim of confidentiality regarding Figure 4 and Figure 9 is not PG&E’s claim of confidentiality. It appears that the photograph in Figure 4 is one initially provided by PG&E, but redacted in the Report.

After receiving the Court’s Order, on December 4, 2019, PG&E contacted the CPUC, which advised that the redactions had been made at the request of CAL FIRE. The same day, PG&E reached out to CAL FIRE to request copies of the photographs and permission to provide them to the Court. On the evening of December 4, 2019, CAL FIRE responded that it had no objection to the provision of the photograph at Figure 4 and confirmed the photograph originated with PG&E. An unredacted copy of Figure 4 is attached to this filing as Exhibit A.

As to Figure 9, CAL FIRE responded it had no objection to the provision of an unredacted copy of the photograph provided that the Butte County District Attorney also agreed. Thereafter, on the morning of December 5, 2019, PG&E reached out to the Butte County District Attorney regarding the Court’s request. As of the time of this filing, it is PG&E’s understanding that the Butte County District Attorney objects to the public filing of an unredacted copy of Figure 9. PG&E’s understanding is that, unlike Figure 4, Figure 9 did not originate with PG&E. Nonetheless, PG&E is endeavoring to determine if the Figure 9 that is redacted in the Report is in its possession in an unredacted format, and, if so, whether it is possessed in a manner that would permit provision to the Court. To the extent PG&E determines it has possession of Figure 9 in an unredacted format it will further update the Court.

Dated: December 5, 2019

Respectfully Submitted,

JENNER & BLOCK LLP

By: /s/ Reid J. Schar  
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

By: /s/ Kevin J. Orsini  
Kevin J. Orsini (*pro hac vice*)

CLARENCE DYER & COHEN LLP

By: /s/ Kate Dyer  
Kate Dyer (Bar No. 171891)

Attorneys for Defendant PACIFIC GAS  
AND ELECTRIC COMPANY